

# **EXHIBIT F**

**Wilson, Andrew**

---

**From:** Reynolds, Steven J. <sreynolds@foxswibel.com>  
**Sent:** Monday, March 16, 2020 9:40 AM  
**To:** Swenson, Jon  
**Cc:** Wilson, Andrew; Vanderporten, Steven L.; Guy, Hop; Smith, Karina; jpfieweger@michaelbest.com; agollwitzer@michaelbest.com; Ives, Erik J.; Koropp, David E.  
**Subject:** RE: Ubiquiti Response to Defendants February 13, 2020 Meet and Confer Letter [IWOV-iManage.FID278983]

[EXTERNAL EMAIL]

Jon,

Surely you know that this is the type of decision that requires client input. We will discuss the matter with Ubiquiti as soon as we can and get back to you.

-Steve

Steve Reynolds  
[sreynolds@foxswibel.com](mailto:sreynolds@foxswibel.com) | 312-224-1249 (direct) | 312-636-4674 (mobile)

**FOX SWIBEL**

FOX SWIBEL LEVIN & CARROLL LLP

200 W. Madison Street, Suite 3000 | Chicago, Illinois 60606  
[www.foxswibel.com](http://www.foxswibel.com) | 312-224-1200 (main) | 312-224-1201 (fax)

**Confidentiality:** This transmission is for the exclusive and confidential use of the intended recipient. It may be an attorney-client communication and privileged. The unauthorized use, disclosure or copying of this transmission is strictly prohibited and may be unlawful. If you have received this transmission in error, please notify me by return mail or telephone and delete the transmission from your system. Thank you.

---

**From:** jon.swenson@bakerbotts.com [mailto:jon.swenson@bakerbotts.com]  
**Sent:** Friday, March 13, 2020 10:27 PM  
**To:** Reynolds, Steven J.  
**Cc:** andrew.wilson@BakerBotts.com; Vanderporten, Steven L.; hop.guy@BakerBotts.com; karina.smith@bakerbotts.com; jpfieweger@michaelbest.com; agollwitzer@michaelbest.com; Ives, Erik J.; Koropp, David E.  
**Subject:** Re: Ubiquiti Response to Defendants February 13, 2020 Meet and Confer Letter [IWOV-iManage.FID278983]

Let's do better. Let us know your response tomorrow.

Jon V. Swenson  
O: 650-739-7514  
M: 650-773-9185

On Mar 13, 2020, at 5:54 PM, Reynolds, Steven J. <sreynolds@foxswibel.com> wrote:

[EXTERNAL EMAIL]

Thanks for the notice, Jon. We'll put our heads together early next week. I'm sure we can come up with something.

Steve Reynolds

[sreynolds@foxswibel.com](mailto:sreynolds@foxswibel.com) | 312-224-1249 (direct) | 312-636-4674 (mobile)

<image001.png>

FOX SWIBEL LEVIN & CARROLL LLP

200 W. Madison Street, Suite 3000 | Chicago, Illinois 60606  
[www.foxswibel.com](http://www.foxswibel.com) | 312-224-1200 (main) | 312-224-1201 (fax)

**Confidentiality:** This transmission is for the exclusive and confidential use of the intended recipient. It may be an attorney-client communication and privileged. The unauthorized use, disclosure or copying of this transmission is strictly prohibited and may be unlawful. If you have received this transmission in error, please notify me by return mail or telephone and delete the transmission from your system. Thank you.

---

**From:** jon.swenson@bakerbotts.com [mailto:jon.swenson@bakerbotts.com]

**Sent:** Friday, March 13, 2020 6:42 PM

**To:** Reynolds, Steven J.; andrew.wilson@BakerBotts.com; Vanderporten, Steven L.; hop.guy@BakerBotts.com; karina.smith@bakerbotts.com; jpfieweger@michaelbest.com; agollwitzer@michaelbest.com

**Cc:** Ives, Erik J.; Koropp, David E.

**Subject:** RE: Ubiquiti Response to Defendants February 13, 2020 Meet and Confer Letter [IWOV-iManage.FID278983]

Steve,

Due to COVID-19 concerns, Mr. Kovanis has just informed us that he is unable to travel to Chicago next week. Given that it seems likely that this situation will persist for at least several weeks, we would like to make arrangements for him to review Ubiquiti's code in the Bay Area where he is.

We suggest that you could send the computer with the code to a location in the Bay Area where he can access it. I do not think your firm has an office in the Bay Area, but it seems likely that Ubiquiti has other outside counsel on other matters that does. We could agree to do the source code inspection there. Alternatively, we could do it at our offices in the Bay Area and be supervised by our attorneys.

Please let us know how you would like to proceed. Happy to jump on a call to discuss if needed.

Thanks,

Jon

**Jon V. Swenson**

T +1.650.739.7514

M +1.650.773.9185

---

**From:** Swenson, Jon

**Sent:** Friday, March 13, 2020 2:46 PM

**To:** 'Reynolds, Steven J.' <sreynolds@foxswibel.com>; Wilson, Andrew <andrew.wilson@BakerBotts.com>; Vanderporten, Steven L. <svanderporten@foxswibel.com>; Guy, Hop <hop.guy@BakerBotts.com>; Smith, Karina <karina.smith@bakerbotts.com>; jpfieweger@michaelbest.com; agollwitzer@michaelbest.com  
**Cc:** Ives, Erik J. <eives@foxswibel.com>; Koropp, David E. <dkoropp@foxswibel.com>  
**Subject:** RE: Ubiquiti Response to Defendants February 13, 2020 Meet and Confer Letter [IWOV-iManage.FID278983]

Steve,

You are correct that our expert plans to be there at 2 on Monday. He may be a little later than 2 given the timing of his flight and depending on traffic.

Should circumstances change, we should discuss alternatives to experts traveling to review code. It strikes me that if we can reach some arrangement that our experts can conduct a review without traveling that would be ideal. Let's see how things play out, but please let us know as soon as you can if the situation changes on your end.

Obviously the review of Ubiquiti's source code is critical to our understanding of the case and will be a key issue with respect to the settlement discussions mentioned by the Court's order today. We need to work to make sure that it is done without interruption.

Thanks,

Jon

**Jon V. Swenson**

T +1.650.739.7514

M +1.650.773.9185

---

**From:** Reynolds, Steven J. <sreynolds@foxswibel.com>

**Sent:** Friday, March 13, 2020 2:37 PM

**To:** Swenson, Jon <jon.swenson@bakerbotts.com>; Wilson, Andrew <andrew.wilson@BakerBotts.com>; Vanderporten, Steven L. <svanderporten@foxswibel.com>; Guy, Hop <hop.guy@BakerBotts.com>; Smith, Karina <karina.smith@bakerbotts.com>; jpfieweger@michaelbest.com; agollwitzer@michaelbest.com

**Cc:** Ives, Erik J. <eives@foxswibel.com>; Koropp, David E. <dkoropp@foxswibel.com>

**Subject:** RE: Ubiquiti Response to Defendants February 13, 2020 Meet and Confer Letter [IWOV-iManage.FID278983]

[EXTERNAL EMAIL]

Jon,

Please confirm that you intend to have your expert (Mr. Kovanis) arrive at our office on Monday (3/16) at 2:00pm central. If so, we will send a calendar invite.

As of now, our office is planning to be open on Monday. But, as I said below, I cannot guarantee what the weekend will bring. I would note that my strong, personal preference (based upon my lay reading of the COVID-19 progression) is to avoid downtown (and our office) as much as possible. But I'm willing to work with you nonetheless.

You mention alternatives to in-office review. If you feel a contingency plan for review is necessary, please propose one before your expert travels, so we can discuss it as needed without finding ourselves in the place of negotiating a solution with your expert already here. That goes for all other expert issues (including disclosures). If you dispatch your expert before we have resolved pending issues/logistics, there's no way to guarantee that those will be resolved prior to arrival. In any event, you must be willing to accept some possibility that the COVID-19 situation will interrupt the review.

-Steve

Steve Reynolds

[sreynolds@foxswibel.com](mailto:sreynolds@foxswibel.com) | 312-224-1249 (direct) | 312-636-4674 (mobile)

<image001.png>

FOX SWIBEL LEVIN & CARROLL LLP

200 W. Madison Street, Suite 3000 | Chicago, Illinois 60606  
[www.foxswibel.com](http://www.foxswibel.com) | 312-224-1200 (main) | 312-224-1201 (fax)

**Confidentiality:** This transmission is for the exclusive and confidential use of the intended recipient. It may be an attorney-client communication and privileged. The unauthorized use, disclosure or copying of this transmission is strictly prohibited and may be unlawful. If you have received this transmission in error, please notify me by return mail or telephone and delete the transmission from your system. Thank you.